



**FIFRA Endangered
Species Task Force**

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U.S. Environmental Protection Agency
Document Processing Desk (*DCI-PRD-Various*)
Office of Pesticide Programs (7504P)
Room S4900 One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: FIFRA Endangered Species Task Force (*Consortium 73989*) Submission of Gopher Information Management System, Golf Course Location Dataset Update, and Licensed Dataset from NatureServe Update

Attention: Marietta Echeverria, Director, Office of Pesticide Programs, Environmental Fate and Effects Division; Brian Anderson, Associate Director, Office of Pesticide Programs, Environmental Fate and Effects Division

Dear Ms. Echeverria and Mr. Anderson:

The FIFRA Endangered Species Task Force L.L.C. (FESTF) submits this letter and its attachments pursuant to the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) to satisfy data requirements for information on the proximity of Federally listed species¹ to pesticide use sites and in response to the requirements of PR Notice 2000-2 and Guideline Number 70-1-SS for special ecological effects studies. Active ingredients relying on this submission are listed in Attachment 1. This submission triggers no Pesticide Registration Improvement Act (PRIA) requirements for fees. It was preceded by 11 related submissions:

- (1) the submission of the alpha-version of the FESTF Information Management System (IMS) under MRID number **46325901** and titled "The FIFRA Endangered Species Task Force Information Management System (IMS): Documentation of Structure and Function of IMS 1.1,"
- (2) a submission under MRID number **46486301** titled "The FIFRA Endangered Species Task Force Information Management System (IMS): Beta-Tested IMS 2.0 and Access to NatureServe Data"
- (3) a submission under MRID number **47260101** titled "NatureServe Data Evaluation and Review"
- (4) a submission under MRID number **47647401** titled "Clomazone: Analysis of Potential Direct and Indirect Effects on Threatened and Endangered Species." The fourth report was submitted

¹ Where "listed" refers to those species identified by the Endangered Species Act as Threatened or Endangered Species

MEMBER COMPANIES

ADAMA Agricultural Solutions, Ltd.
Albaugh, LLC.
AMVAC Chemical Corp.
Arysta LifeScience
BASF Corp.

Bayer CropScience
Corteva AgriScience
Dow DuPont Operations
FMC Corp., Ag. Products
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ISK Biosciences Corp.
Nichino America, Inc.
Nippon Soda Co., Ltd.
Nissan Chemical Industries, Ltd.
Nufarm Americas, Inc.

PBI/Gordon Corp.
Syngenta Crop Protection, Inc.
Valent USA Corp.

jointly by FESTF and FMC Corporation and contains information relevant to clomazone as well as details relevant to certain species/use relationships that are useful to any analysis of this type.

(5) A submission under MRID numbers **48969500, 48969501, 48969502, 48969503, 48969504, 48969505, and 48969506** that provided Federally Listed Species Location and Attribute Information,

(6) a submission under MRID number **49272701** titled “Proximity Databases for Species Occurrences and Designated Critical Habitat Developed by the FIFRA Endangered Species Task Force” which added to the information presented in submission (5),

(7) a submission under MRID number **49575201** titled “Species Maps Using FESTF Aggregated Species Location Data and EPA-Provided Action Area Data – Phase I”, utilizing data presented in submission (5),

(8) a submission under MRID Numbers **49643401, 49643402, and 49643403** that provided Phase 2 maps, aggregated data updates, and a golf course location dataset licensed by FESTF,

(9) a submission under MRID Number **49880801** that provided Phase 3 maps,

(10) a submission under MRID Number **49974901 and 49974902** that provided an update to FESTF’s licensed dataset from NatureServe and update to the golf course location dataset presented in submission (8), and

(11) a submission under MRID Number **50436801 and 50436802** that provided a supplement to the Phase 3 maps presented in submission (9) and an update to the golf course location dataset presented in submission (10).

The current, 12th submission provides the report, “Gopher: An Endangered Species Information Management System Developed by FESTF” describing an enhanced Information Management System that updates the previous Information Management System described in submission (1) and (2), the report “Golf Course Location Data Licensed by the FIFRA Endangered Species Task Force – 2019 Update” updating the dataset presented in submission (11), and the report “NatureServe Dataset Licensed by the FIFRA Endangered Species Task Force – 2019” updating the licensed dataset presented in submission (10).

For more than 20 years, in order to register and maintain their pesticide active ingredient products, the members of the FIFRA Endangered Species Task Force (FESTF) have been required by EPA to generate and submit to the Agency at very significant cost substantial data to meet FIFRA and Endangered Species Act legal requirements. The members have complied with these requirements and have submitted and continue to submit the necessary data to EPA and the U.S. Fish and Wildlife Service. As a result of FESTF’s work, the Task Force has contributed to EPA’s endangered species and pesticide assessment process for more than two decades. This data submission is required by EPA to support all active ingredients and end use products for which EPA must conduct an endangered species assessment. Additional details are provided in the attached transmittal document, including lists of:

- FESTF members; and
- all active ingredients relying upon the Gopher IMS to support EPA-OPP endangered species assessments.

The 24 studies (three submitted here and 21 previously submitted as listed above) represented by these related submissions are mutually supportive. Pursuant to the data compensation provisions of FIFRA, all registrants, whether FESTF members or not, must cite the entire FESTF database when EPA uses any part of FESTF’s submissions in determining whether a registrant has met the Agency’s endangered species

assessment requirements. Accordingly, any reliance on the current submission or the previous 11 submissions discussed here for non-member company registrations will require the registrant or applicant involved to join or offer to compensate the FESTF. Any offers to compensate must include specific reference to **all** Task Force work products, as set forth in Pesticide Registration (PR) Notice 2000-2. FESTF designates as its data compensation agent for FESTF's listing on EPA's Data Submitters List:

Ms. Bernalyn McGaughey
c/o Compliance Services International
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Please note that two of the reports being submitted are accompanied by confidential files which are marked as such. There is one confidential file being submitted with two of the reports. Additionally, this work product is submitted under the "voluntary" submission route in the Pesticide Submission Portal because the system could not handle it as a "New PSP package". It is in response to a data requirement generated by FESTF in direct response to agency needs. The voluntary submission route should not imply that the data contained therein were developed voluntarily.

In conclusion, the FESTF is pleased to submit the materials provided here to satisfy EPA data requirements related to the potential exposure of Federally listed species to pesticides.

If there are questions regarding this submission please feel free to contact the following individuals:

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Sincerely,



Robin Charlton, Chair, Administrative Committee
FIFRA Endangered Species Task Force L.L.C.

Enclosures:
Data Transmittal Document
List of Active Ingredients
EPA Form 8570-35, Data Matrix
EPA Form 8570-1, Pesticide Application

Report:

“Gopher: An Endangered Species Information Management System Developed by FESTF”
Compliance Services International Study 19709, 35 pp., MRID No. 51011101

Report:

“Golf Course and Other Non-Agricultural Location Data Licensed by the FIFRA Endangered Species Task Force – 2019 Update”
Compliance Services International Study 19708, 9 pp., MRID No. 51011102

Report:

“NatureServe Dataset Licensed by the FIFRA Endangered Species Task Force – 2019”
Compliance Services International Study 19710, 19 pp., MRID No. 51011103

cc: (Administrative Cover Letter and Transmittal Document Only):

Rick Keigwin, Jr., Director, EPA

Elissa Reaves (Acting Director, Pesticide Re-Evaluation Division)

Mike Goddis (Director, Registration Division)

FESTF members

Tilghman Hall, Technical Chair, FESTF

Diego Fonseca, Administrative Co-Chair, FESTF